

Exhibit F

Docket No. X07 CV-03-0083299-S (CLD)

STATE OF CONNECTICUT : SUPERIOR COURT
:
vs. : COMPLEX LITIGATION DOCKET
: AT TOLLAND
:
AVENTIS PHARMACEUTICALS, INC. : May 6, 2005

NOTICE OF DEPOSITION

TO: ALL COUNSEL ON ATTACHED SERVICE LIST:

Pursuant to Practice Book §13-26, et. seq., notice is hereby given that on June 10, 2005, at 9:30 A.M. at the offices of Shepherd, Finkelman, Miller, & Shah, LLC, 65 Main Street, Chester, Connecticut, 06412, before a Notary Public, Jeffrey Kodroff, Esquire and John Macoretta, Esquire, attorneys for the Plaintiff in the above-captioned action will take the deposition of defendant, Aventis Pharmaceuticals', Inc. §13-27(h) designee who is knowledgeable of the matters itemized in Exhibit "A."

The oral examination will continue from day to day until completed. You are invited to attend and examine the witness.

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Dated: May 6, 2005

EXHIBIT "A"

INSTRUCTIONS

All of the definitions from Plaintiffs' First Set of Requests For Production to Aventis are incorporated herein by reference.

"Spread" refers to the difference between AWP or any price upon which reimbursement for a drug is based, on the one hand, and the actual or net price paid for a drug on the other hand.

Unless otherwise specifically stated, each of these Areas of Inquiry encompasses the years 1993 through the present.

AREAS OF INQUIRY

1. The process by which You establish, state, change or are otherwise directly or indirectly involved in setting the AWP, List Price, WAC, Average Wholesale Price, actual sales price, contract price or any other price for each of Your Listed Pharmaceuticals, including the names or job titles of all personnel involved in said processes and all documents created in connection with said processes.
2. Your policies or practices concerning the calculation, determination, dissemination, communication or publication of the AWP, List Price, WAC, or any other price for all of Your Listed Pharmaceuticals.
3. The process by which You decide to offer any type of discount, rebate, incentive or penalty in connection with the purchase of any Listed Pharmaceuticals, and the names or job titles of all personnel involved in said process.

4. The identity and nature of any regularly created documents which report, review, comment upon or analyze any price stated or charged for any of Your Listed Pharmaceuticals.

5. The method by which You calculate or determine the average sales price for Your Listed Pharmaceuticals, including any determination or rendering of actual transaction costs and/or revenues at any level of the distribution or processing chains.

6. The method by which You calculate or determine the net profit for each of Your Listed Pharmaceuticals.

7. The nature of Your efforts to market, promote or tout the Spread on any of Your drugs, and the names or job titles of all personnel involved in said efforts.

8. The nature of Your efforts to market, promote or sell any of Your Listed Pharmaceuticals including, but not limited to, Your marketing, promotion or sales efforts directed towards the State of Connecticut, including all of its agencies, divisions, departments and employees.

9. The identity and nature of Your communications with the State of Connecticut, including all of its agencies, divisions, departments and employees.

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